



CITY OF CARSON

July 28, 2010

Mr. Teklewold Ayalew, Project Manager
California Regional Water Quality Control Board, Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Tentative Cleanup and Abatement Order No. RB4-2010-XXX

Dear Dr. Ayalew:

Thank you for the opportunity to review and comment on the tentative Cleanup and Abatement Order (CAO) issued to Shell Oil Products US (Shell). The tentative CAO concerns the former Kast Property Tank Farm and existing Carousel Tract, a neighbor of 285 homes. The tentative CAO requires Shell to assess, monitor, and cleanup and abate the effects of petroleum hydrocarbon compounds and other contaminants of concern discharged into the soil and groundwater.

The city of Carson (City) has been actively participating in the environmental investigation of the Carousel Tract and monitoring the response of all agencies which are responsible for protecting the community. Since March 2010, there has been an increase in the number of homes tested and a better understanding of the petroleum hydrocarbon contaminants, including benzene and methane, detected in soil, soil vapor and groundwater beneath the homes and public streets. Based upon studies and information submitted by Shell, its representatives and Girardi and Associates, the law firm retained by a significant number of the Carousel residents, the Regional Board has ordered Shell to complete the investigation to determine the extent of contamination and to prepare a Pilot Test Work Plan and a full-scale Remedial Action Plan.

We recognize the concerns that residents of Carousel and surrounding areas have for the safety of their families and homes. We share those concerns. Carson is committed to supporting efforts to protect the health and safety of our residents and to prioritize all measures to preserve our neighborhoods. There have been initial comments suggesting that the Carousel neighborhood should be abandoned. We sincerely hope that this option is not necessary. The Carousel neighborhood has always been a special place for families to raise their children and for residents to enjoy the security of nice homes within a stable community. We trust that the Regional Board and responsible regulatory agencies will facilitate the identification of remedial systems that will optimize the removal of harmful contaminants, prevent residents from being

Mr. Teklewold Ayalew (cont'd)

July 28, 2010

Page 2

unduly exposed to risks during the implementation of remedial efforts and improve system efficiency by promoting a coordinated review and response by all affected agencies and stakeholders.

The city of Carson will be acting as a Responsible Agency in the issuance of any services or permitting associated with the implementation of the Pilot Test Work Plan and Remedial Action Plan. As such, the plans should provide for early consultation and a requirement for local permits to be obtained for all work falling under the authority of the City. We would also like to assist in encouraging more effective public participation and will consult with the Regional Board and Shell in the development of a Public Participation Plan.

The city of Carson appreciates the opportunity to comment on the tentative CAO. We recognize the importance of our continued efforts to work together to identify effective and appropriate remediation strategies for the residents of the Carousel Tract and surrounding community. If you have any comments or questions regarding this letter, please contact Ms. Sheri Repp Loadsman of my staff at (310) 952-1773 or via e-mail at Srepp@carson.ca.us.

Sincerely,



Jerome G. Groomes
City Manager

cc: Mayor and Councilmembers
General Managers
Sheri Repp-Loadsman
City Attorney